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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY MXN DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

March 2015 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAMASO LOPEZ-SERRANO (1),
aka "Mini Lic,"
aka "Dani,"
aka "Jose Daniel Lopez Hernandez,"
NAHUM ABRAHAM SICAIROS-MONTALVO (2),
aka "Kinceanero,"

ALVARO LOPEZ-NUNEZ (6),
aka "Raul,"

Defendants.

Case No. **16CR1896DMS**

I N D I C T M E N T

Title 21, U.S.C., Secs. 959,
960, and 963 - Conspiracy to
Distribute Methamphetamine,
Cocaine and Heroin Intended for
Importation; Title 21, U.S.C.,
Secs. 952, 960, and 963 -
Conspiracy to Import
Methamphetamine, Cocaine and
Heroin; Title 18, U.S.C., Secs.
1956(h) and 1956(a)(2)(A) -
Conspiracy to Launder Money;
Title 21, U.S.C., Sec. 853, and
Title 18, U.S.C., Sec. 982 -
Criminal Forfeiture

The grand jury charges:

Count 1

Beginning no later than in or about May 2005 and continuing up to
and including August 19, 2016, within the Southern District of
California, and elsewhere, defendants DAMASO LOPEZ-SERRANO, aka "Mini
Lic," aka "Dani," aka "Jose Daniel Lopez Hernandez," NAHUM ABRAHAM
SICAIROS-MONTALVO, aka "Kinceanero,"

ALB:nlv:San Diego
8/17/16

1 [REDACTED] and ALVARO LOPEZ-NUNEZ, aka "Raul," who will first enter the
2 United States in the Southern District of California, did knowingly
3 and intentionally conspire together and with each other, and with
4 other persons known and unknown to the grand jury, to distribute and
5 cause the distribution of 500 grams and more of a mixture and
6 substance containing a detectable amount of methamphetamine and
7 5 kilograms and more of a mixture and substance containing a
8 detectable amount of cocaine, both Schedule II Controlled Substances;
9 and 1 kilogram and more of a mixture and substance containing a
10 detectable amount of heroin, a Schedule I Controlled Substance;
11 intending, knowing and having reasonable cause to believe that such
12 methamphetamine, cocaine and heroin would be unlawfully imported into
13 the United States; all in violation of Title 21, United States Code,
14 Sections 959, 960, and 963.

15 Count 2

16 Beginning no later than in or about May 2005 and continuing up to
17 and including August 19, 2016, within the Southern District of
18 California, and elsewhere, defendants DAMASO LOPEZ-SERRANO, aka "Mini
19 Lic," aka "Dani," aka "Jose Daniel Lopez Hernandez," NAHUM ABRAHAM
20 SICAIROS-MONTALVO, aka "Kinceanero," [REDACTED] [REDACTED] [REDACTED] [REDACTED]
21 [REDACTED]

22 [REDACTED] and ALVARO LOPEZ-NUNEZ, aka "Raul," did knowingly and
23 intentionally conspire together and with each other, and with other
24 persons known and unknown to the grand jury, to import 500 grams and
25 more of a mixture and substance containing a detectable amount of
26 methamphetamine and 5 kilograms and more of a mixture and substance
27 containing a detectable amount of cocaine, both Schedule II Controlled
28 Substances; and 1 kilogram and more of a mixture and substance

1 containing a detectable amount of heroin, a Schedule I Controlled
2 Substance; into the United States from a place outside thereof; all in
3 violation of Title 21, United States Code, Sections 952, 960, and 963.

4 Count 3

5 Beginning no later than in or about May 2005 and continuing up to
6 and including August 19, 2016, within the Southern District of
7 California and elsewhere, defendant [REDACTED]
8 [REDACTED] did knowingly and intentionally conspire with other persons
9 known and unknown to the grand jury, to commit offenses against the
10 United States under Title 18, United States Code, Section 1956,
11 namely: transport, transmit and transfer monetary instruments and
12 funds, that is United States currency, from a place in the United
13 States to and through a place outside the United States, with the
14 intent to promote the carrying on of specified unlawful activity, that
15 is the distribution of controlled substances, in violation of
16 Title 18, United States Code, Section 1956(a)(2)(A); all in violation
17 of Title 18, United States Code, Section 1956(h).

18 Criminal Forfeiture Allegations

19 1. The allegations contained in Counts 1 through 3 of this
20 Indictment are realleged and by reference fully incorporated herein
21 for the purpose of alleging forfeiture to the United States of America
22 pursuant to the provisions of Title 21, United States Code,
23 Section 853, and Title 18, United States Code, Section 982.

24 2. As a result of the commission of the felony offenses alleged
25 in Counts 1 and 2 of this Indictment, said violations being punishable
26 by imprisonment for more than one year and pursuant to Title 21,
27 United States Code, Sections 853(a)(1) and 853(a)(2), defendants
28 DAMASO LOPEZ-SERRANO, aka "Mini Lic," aka "Dani," aka "Jose Daniel

1 Lopez Hernandez," NAHUM ABRAHAM SICAIROS-MONTALVO, aka "Kinceanero,"
2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]"
3 [REDACTED] and ALVARO LOPEZ-NUNEZ, aka
4 "Raul," shall, upon conviction, forfeit to the United States all their
5 rights, title and interest in any and all property constituting, or
6 derived from, any proceeds any defendant obtained, directly or
7 indirectly, as the result of the felony offenses alleged in this
8 Indictment, and any and all property used or intended to be used in
9 any manner or part to commit and to facilitate the commission of the
10 violations alleged in this Indictment.

11 3. As a result of the commission of the felony offense alleged
12 in Count 3 of this Indictment, said violation being punishable by
13 imprisonment for more than one year, and pursuant to Title 18, United
14 States Code, Section 982(a)(1), defendant [REDACTED] [REDACTED]
15 [REDACTED] shall, upon conviction, forfeit to the United States all
16 rights, title and interest in any and all property involved in such
17 offense, and any property traceable to such property.

18 4. If any of the above-described forfeitable property, as a
19 result of any act or omission of the defendants:

- 20 a. cannot be located upon the exercise of due diligence;
21 b. has been transferred or sold to, or deposited with, a
22 third party;
23 c. has been placed beyond the jurisdiction of the Court;
24 d. has been substantially diminished in value; or
25 e. has been commingled with other property which cannot be
26 subdivided without difficulty;

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1 it is the intent of the United States, pursuant to Title 21,
2 United States Code, Section 853(p), as to Counts 1 and 2, and
3 Title 21, United States Code, Section 853(p), as incorporated by
4 Title 18, United States Code, Section 982(b)(1) as to Count 3 to seek
5 forfeiture of any other property of the defendant up to the value of
6 the said property listed above as being subject to forfeiture.

7 All in violation of Title 21, United States Code, Section 853,
8 Title 18, United States Code, Section 982.

9 DATED: August 19, 2016.

10 A TRUE BILL:

11 
12 _____
Foreperson

13 LAURA E. DUFFY
14 United States Attorney

15 By:

16 
ADAM L. BRAVERMAN
Assistant U.S. Attorney